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Attorney for Defendant Creditors Collection Service, Inc.

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

LYNDSEY M. KNIGHTEN, AN
OREGON RESIDENT,

Plaintiff,

vs.

CREDITORS COLLECTION SERVICE,
INC., AN OREGON CORPORATION;
MARY'S PEAK EMERGENCY
PHYSICIANS, P.C., AN OREGON
PROFESSIONAL CORPORATION;
MORLEY THOMAS, LLC DBA THE
MORLEY THOMAS LAW FIRM, AN
OREGON LIMITED LIABILITY
CORPORATION; JESSICA K. MEYER,
AN OREGON RESIDENT; AND ABBE
E. MONTGOMERY, MD, AN OREGON
RESIDENT,

Defendants.

Case No.

NOTICE OF REMOVAL

Please take notice that defendant Creditors Collection Service, Inc. ("CCS")
hereby removes this action from the Circuit Court in and for Multnomah County, State of
Oregon to the United States District Court for the District of Oregon.

1. CCS is a party in a civil action brought against CCS in the Circuit Court in and for Multnomah County, State of Oregon entitled: "LYNDSEY M. KNIGHTEN, AN OREGON RESIDENT, Plaintiff, v. CREDITORS COLLECTION SERVICE, INC., AN OREGON CORPORATION; MARY'S PEAK EMERGENCY PHYSICIANS, P.C., AN OREGON PROFESSIONAL CORPORATION; MORLEY THOMAS, LLC DBA THE MORLEY THOMAS LAW FIRM, AN OREGON LIMITED LIABILITY CORPORATION; JESSICA K. MEYER, AN OREGON RESIDENT; AND ABBE E. MONTGOMERY, MD, AN OREGON RESIDENT, Defendants, No. 17CV18466." A copy of the summons, and complaint in that action are attached to this notice and constitute all process, pleadings, and orders served on CCS in that action up to the present date.

2. The state court action was commenced when the complaint was filed with the county clerk for Multnomah County, Oregon on May 5, 2017. A copy of the summons and complaint was served on CCS on June 23, 2017. CCS has filed no pleadings in this cause. This notice of removal is filed within 30 days after service of process on CCS. No other party has filed any pleadings in this action.

3. This is an action of civil nature over which this court has original jurisdiction pursuant to 15 USC § 1692k in that it is a liability allegedly created under the Fair Debt Collection Practices Act, 15 USC § 1692 et seq.,

4. This notice is signed pursuant to FRCP 11.

Dated: June 28, 2017.

/s/ Jeffrey I. Hasson
Jeffrey I. Hasson, OSB#872419
Hasson Law, LLC
(503) 255-5352
Attorneys for Petitioner CCS

Certificate of Service

I hereby certify that on June 28, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Justin M. Baxter, Laurie J. Hart, Peter D. Eidenberg and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

_____.

s/ Jeffrey I. Hasson
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